

IN THE UNITED STATES FEDERAL DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CLIFF JOHNSON
Defendant.

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CR. NO. 2:06cr-169-WHA

CLIFF JOHNSON'S MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS

COMES, James R. Cooper, Jr. who on behalf of his client Cliff Johnson, does move for an extension of time in which to file pretrial motions and further states as follows:

1. Mr. Cooper has recently been appointed to this case. (Last week) Mr. Johnson said that he has his own private attorney. To date that attorney has not filed a Notice of Appearance or otherwise notified Mr. Cooper that he does actually represent Mr. Johnson.
2. Discovery in this case will cost over \$ 1000.00. To date Mr. Cooper has not received discovery. Until he receives it, assuming that he is to remain Mr. Johnson's attorney, and has gone over it (which will take a month) he does not know what if any pretrial motions must be filed on behalf of his client.
3. There are 16 defendants in this case. Most of their attorneys have either filed similar requests or are going to. In those requests filed to date, the government has not raised any objection to an extension of time.

Wherefore Mr. Johnson requests that he be granted an extension of time in which to file pretrial motions and all other appropriate relief.

RESPECTFULLY SUBMITTED,

/s/ James R. Cooper, Jr.
James R. Cooper, Jr. (COO021)
COOPER & COOPER

312 Scott Street
Montgomery, Alabama 36104
(334) 262-4887
(334) 262-4880 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of March, 2007 , I have served a copy of the foregoing Notice of Intent to Change Plea Upon Ms. Clark Morris, AUSA , at the last known address of: P.O. Box 197, Montgomery, Al By placing a copy of the same in the United States Mail properly addressed and postage prepaid and electronically.

/s/James R. Cooper, Jr.
JAMES R. COOPER, JR.

Cc:
Cliff Johnson
Montgomery City Jail
P. O. Drawer 159
Montgomery, AL 36104